



Illinois | New Jersey | New York | Ohio | Oregon

Javier L. Merino*

Direct Dial: 201-355-3440

Facsimile: 216-373-0536

Email: JMerino@DannLaw.com

December 19, 2017

Via ECF and Courtesy Copy via Fax: (212) 805-7986

Judge Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

Re: Kayla Reed v. Burberry Limited- Case No.: 1:17-cv-08354

Dear Judge Gardephe:

This firm represents Plaintiff Kayla Reed (“Plaintiff”) in the above-captioned matter. Pursuant to your Individual Practice Rules, we write to respectfully request that the Initial Conference currently set for January 4, 2018, be rescheduled to January 25, 2018, (30 days) with any deadlines extended accordingly. Plaintiff is in the process of perfecting service on Burberry Limited (“Defendant”) via the Department of State. Initially we served a summons and complaint to the registered agent designated with the Secretary of State. However, because the address listed with the Secretary of State’s office was not a valid address, we served them at the registered agent’s current address. Due to the invalid address for their registered agent and their failure to answer, we are serving them again to ensure service is perfected.

This request is made to permit the Defendant with the appropriate time to answer the Complaint and allow the parties to pursue an amicable resolution of this matter without the need for further litigation. This is the Plaintiff’s first request for an extension of time. There is no consent to this request due to the unknown identity of Defendant’s counsel.

We thank the Court for its consideration of this request.

Respectfully Submitted,

/s/ Javier L. Merino, Esq.

Javier L. Merino, Esq

cc. Burberry Limited via service on Department of State

DannLaw
1 Meadowlands Plaza, Suite 200
East Rutherford, New Jersey 07071

DannLaw.com
[877] 475-8100

*Licensed in NJ and NY